

# EXHIBIT 1

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July 3, 2014

**VIA U.S. MAIL**

Attorney General of Alabama  
501 Washington Avenue  
P.O. Box 300152  
Montgomery, AL 36130-0152

**Re: Class Action Fairness Act of 2005 Notification**

*Kevin Turner and Shawn Wooden, on behalf of themselves and others similarly situated v. National Football League and NFL Properties LLC, No. 2:14-cv-00029 (E.D. Pa.); In re: National Football League Players' Concussion Injury Litigation, No. 2:12-md-02323-AB, MDL No. 2323 (E.D. Pa.)*

Dear Sir/Madam Attorney General:

Pursuant to the provisions of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, the defendants National Football League and NFL Properties LLC (collectively the "NFL Parties") hereby give notice that the parties<sup>1</sup> in the above-referenced lawsuit have entered

<sup>1</sup> The parties include the NFL Parties and proposed Class and Subclass Representative Plaintiffs. The proposed Settlement Class is defined as all Retired NFL Football Players, Representative Claimants and Derivative Claimants, where:

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into a proposed settlement of a class action subject to the final approval of the United States District Court for the Eastern District of Pennsylvania. In compliance with 28 U.S.C. § 1715, the NFL Parties submit with this notice the following:

1. Copies of the complaints and amended complaints filed in this action:
  - a. The Master Administrative Class Action Complaint for Medical Monitoring filed on June 7, 2012;
  - b. The Master Administrative Long-Form Complaint filed on June 7, 2012;
  - c. The Amended Master Administrative Long-Form Complaint filed on July 9, 2012;
  - d. The Class Action Complaint filed on January 6, 2014 in *Turner, et al. v. National Football League, et al.*, No. 2:14-cv-00029-AB (E.D. Pa.).
2. The proposed class action settlement, entered into on June 25, 2014;
3. The proposed notification to proposed Settlement Class Members;
4. A list, based on the information available to the NFL Parties, of the names of proposed Settlement Class Members organized by the state in which they reside. The NFL Parties believe the proportionate share of the benefits of the settlement will be consistent with the percentage of residents in the states as listed.

Hard copies of the complaints listed in #1, above, are enclosed. The documents identified in #2 - #4, above, are enclosed on a CD-ROM. In addition, copies of these documents were filed with the court electronically and, therefore, are also available through the Public Access to Court Electronic Records (PACER) docketing system. *See* 2:12-md-02323, Dkt. Nos. 83, 84, 2642, 6073; 2:14-cv-00029, Dkt. No. 1.

The files on the enclosed disk are encrypted and can be accessed using the following codes:

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“Retired NFL Football Players” means all living NFL Football players who, prior to the date of the Preliminary Approval and Class Certification Order, retired, formally or informally, from playing professional football with the NFL or any Member Club, including American Football League, World League of American Football, NFL Europe League and NFL Europa League players, or were formerly on any roster, including preseason, regular season, or postseason, of any such Member Club or league and who no longer are under contract to a Member Club and are not seeking active employment as players with any Member Club, whether signed to a roster or signed to any practice squad, developmental squad, or taxi squad of a Member Club;

“Representative Claimants” means authorized representatives, ordered by a court or other official of competent jurisdiction under applicable state law, of deceased or legally incapacitated or incompetent Retired NFL Football Players; and

“Derivative Claimants” means spouses, parents, children who are dependents, or any other persons who properly under applicable state law assert the right to sue independently or derivatively by reason of their relationship with a Retired NFL Football Player or deceased Retired NFL Football Player.

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At this time, there has been no final judgment or notice of dismissal (28 U.S.C. § 1715(b)(6)), and there is no written judicial opinion relating to the materials described in subparagraphs (3) through (6) of subsection 1715(b) (28 U.S.C. § 1715(b)(8)). Furthermore, there are no other contemporaneous settlement agreements between the NFL Parties and Co-Lead Class Counsel, Class Counsel, or Subclass Counsel. The NFL Parties will provide supplemental notice of each of the events and documents described in this Paragraph.

Any correspondence concerning the proposed settlement should be sent to the Clerk of the Court, James A. Byrne U.S. Courthouse, 601 Market Street, Philadelphia, PA. Copies of any such correspondence should also be sent to me and Co-Lead Class Counsel, Class Counsel, and Subclass Counsel, contact information for whom is annexed hereto as Appendix A.

This notice is given pursuant to 28 U.S.C. § 1715. Subsection 1715(f) provides that “[n]othing in this section shall be construed to expand the authority of, or impose any obligations, duties, or responsibilities upon, Federal or State officials.”

If you have any questions about the proposed settlement agreement, or the underlying litigation, please feel free to contact me.

Sincerely,

  
Brad S. Karp

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Dated: July 3, 2014

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